

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

January 24, 2003

Dennis L. Barbee, Ph.D.
Director, Regulatory Affairs
Buckman Laboratories, Inc.
1256 North McLean Blvd.
Memphis, TN 38108

Subject: W-15-2
EPA Registration No. 1448-212
Application Date: November 25, 2002
EPA Received Date: November 29, 2002

Dear Dr. Barbee:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below.

Proposed Amendment

- Update First Aid Statement per PR Notice 2001-1

Conditions

Revise the label as follows:

1. Separate the Precautionary Statement heading from the First Aid Statements. In addition, the precautionary heading and its statement must be grouped together to read as follows:

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid breathing vapors. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

2. The child signal word "Caution" and the "Keep Out of Reach of Children" statement must be placed under the ingredient statement.

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- 3. Revise the statement "...swimming season and are free of visible algae, add 50 to 77 fluid ounces per 10,000 gallons." to read "...swimming season and are free of visible algae, add 27 to 43 fluid ounces per 10,000 gallons." to agree with the last accepted product label, dated May 6, 1994.

Other Comments

Note that if you intend to revise your label rates, you must submit a formal request i.e. amendment application.

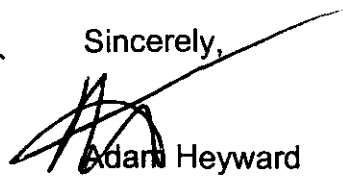
Please explain why this product label does not contain a re-entry interval time following the application of this product in swimming pools, spas, whirlpools, and hot tubs.

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit one(1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,



Adam Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510 C)



KEEP OUT OF REACH OF CHILDREN

CAUTION

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

FIRST AID

Table with 2 columns: Condition (If in Eyes, If on Skin, etc.) and First Aid instructions.

HOT LINE NUMBER

Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.

CAUTION: Harmful if swallowed. Avoid breathing vapors, Avoid contact with skin, eyes, or clothing.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge.

Table listing Active Ingredients (Poly[oxyethylene(dimethyliminio)ethylene] 15.0%) and Inert Ingredients (85.0%), totaling 100.00%.

Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal.

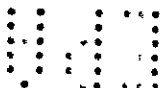
PESTICIDE STORAGE: Do not stack more than four drums high. Leaking or damaged drums should be placed in overpack drums for disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL

PLASTIC: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, by incineration, or if allowed by state and local authorities, by burning.

METAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.



Manufactured by Buckman Laboratories, Inc. 1255 North McLean Blvd., Memphis, Tennessee 38108, USA (901) 278-3330 or 1-800-BUCKMAN

EPA Est. No. 1448-TN-1 EPA Reg. No. 1448-212 Product Weight 8.6 lbs/gal. 1.03 kg/l Net contents are marked on the container.

Table with HMS/NPCA Ratings and Last Revision (11/3/2002).

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with the label.

W-15-2 is used to control algae, bacteria, and fungi in recirculating commercial swimming pools, hot tubs, spas, whirlpools, hot tubs, and other enclosed water systems. The water must be cleaned to remove algal growth, microbiological slime, and other deposits. Repeat initial dosage until control is evident.

Subsequent slug additions of 1.0 to 10.0 fluid ounces of W-15-2 per 1000 gallons of water should be employed every 2 to 5 days, or as needed. The frequency of addition depends on the severity of the microbiological problem. Slug additions should be made in the sump of water circulation system.

W-15-2 is used to control bacteria in industrial air-washing systems that maintain clean surfaces. The system should be cleaned to remove bacterial slime and other deposits. An initial slug of water is recommended. Repeat initial dosage until control is evident. Subsequent slug additions of 1 to 5 gallons of water should be employed each 1 to 5 days, or as needed. The frequency and severity of the bacterial problem. Slug additions may be made to the sump of water circulation system.

W-15-2 is used to control the growth of algae in swimming pools, exterior spas, hot tubs, whirlpools, hot tubs, and other enclosed water systems. For maximum effectiveness, pools, spas, whirlpools, hot tubs, and other enclosed water systems should be cleaned prior to using W-15-2.

For pools having just visible algae growth, add an initial dose of 50 to 77 fluid ounces of W-15-2 per 1000 gallons of water. For treatment of a freshly cleaned and lined pool, add 1 to 2 fluid ounces of W-15-2 per 1000 gallons of water. Subsequent additions of 1 to 2 fluid ounces of W-15-2 per 1000 gallons of water should be made for maintenance.

Subsequent additions of 9 to 18 fluid ounces of W-15-2 per 10,000 gallons of water should be made for maintenance.

Spas, whirlpools, hot tubs, decorative fountains, and ponds having just visible algae growth should be cleaned to remove algal growth, microbiological slime, and other deposits. For treatment of a freshly cleaned spa, whirlpool, hot tub, or pond, add 50 to 77 fluid ounces of W-15-2 per 1000 gallons of water. Subsequent additions of 1 to 2 fluid ounces of W-15-2 per 1000 gallons of water should be made for maintenance.

W-15-2 will prevent growth of most algae during the off-season winter months when pools, spas, whirlpools, hot tubs, and ponds are not being used. Pools, spas, whirlpools, hot tubs, and ponds treated during the swimming season and are free of visible algae, add 50 to 77 fluid ounces of W-15-2 per 1000 gallons of water. Subsequent additions of 1 to 2 fluid ounces of W-15-2 per 1000 gallons of water should be made for maximum effectiveness. Repeat the treatment one or more times during the season.

W-15-2 is compatible with those chemicals normally used to treat pools and spas. Do not use W-15-2 in pools and spas treated with chlorine chemicals and may reduce the amount of chlorine needed. W-15-2 with concentrated dry or liquid chlorine products.

ACCEPTED with COMMENT EPA Letter Date JAN 24 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act, amended, for the pesticide registered under EPA Reg.